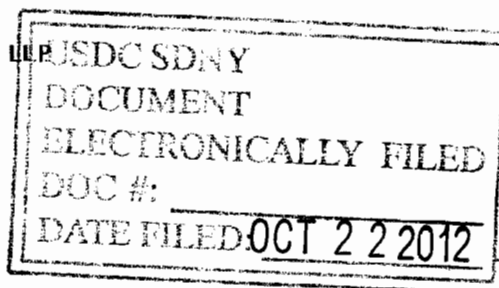


BAKER BOTTS

October 15, 2012

BY FACSIMILE

The Honorable Laura Taylor Swain
 United States District Court for the
 Southern District of New York
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street, Courtroom 11C
 New York, New York 10007

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MEMO ENCLOSED

Re: Williamson v. Verizon Communications Inc. et al., Case No. 1:11-cv-04948 (LTS)

Dear Judge Swain:

We represent Defendants AT&T, Inc., AT&T Operations, Inc., and AT&T Services, Inc. ("AT&T") in the above-referenced action, and jointly write to request permission to file confidential documents under seal with the Verizon Defendants. No protective order has yet been entered in this case, though the parties are actively preparing and conferring on a form of stipulated protective order to be submitted for the Court's consideration.

Defendants are filing a motion for spoliation sanctions on October 16, 2012. The memorandum of law and certain exhibits Defendants seek to submit in support have been designated Confidential Information. We respectfully request that the Court enter an Order permitting Defendants to file their brief and exhibits under seal.

Defendants have good cause for this request because the memorandum of law and exhibits contain information that has designated confidential. Defendants have conferred with counsel for Plaintiff in good faith and Plaintiff does not oppose this request for under seal filing.

Respectfully submitted,


 Richard Harper

RH:jpm

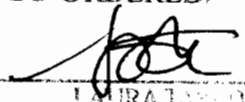
cc: All Counsel of Record (via email)

The request is
 granted. redacted
 copies must be
 filed on the
 ECF system.

SO ORDERED.

NEW YORK, NY

Oct 18 012


 LAURA TAYLOR SWAIN

UNITED STATES DISTRICT JUDGE